

<p style="text-align: right;">Page 54</p> <p>1 of hotels in the Tucker precinct that have a high 2 crime rate.</p> <p>3 And that is the list that we've talked 4 about --</p> <p>5 A Right.</p> <p>6 Q -- that you're looking at there, 7 Plaintiff's Exhibit 7.</p> <p>8 Answer: Yes. Question: And which hotel is 9 at the top of the list? Answer: The United Inn.</p> <p>10 Question: Do you understand that to mean the United 11 Inn had the highest crime rate in Tucker precinct of 12 all the hotels in Tucker? Answer: Yes, I can believe 13 that. Question: Did the crime that occurred at the 14 United Inn and Suites include commercial sex activity 15 like prostitution and sex trafficking? Answer: Yes.</p> <p>16 Question: Did you consider commercial sex activity, 17 like prostitution and sex trafficking, to be common 18 at the United Inn and Suites? Answer: Yes.</p> <p>19 Question: Did you consider commercial sex activity, 20 like prostitution and sex trafficking, to be a 21 problem at the United Inn and Suites from 2015 to 22 2021? Answer: Yes.</p> <p>23 Did you hear what I just read?</p> <p>24 A Yes.</p> <p>25 Q Does that testimony surprise you?</p>	<p style="text-align: right;">Page 55</p> <p>1 prostitution on the property. Do you understand what 2 I read?</p> <p>3 A No, can you just...</p> <p>4 Q You want me to read it again?</p> <p>5 A No, just rephrase it. I -- I'm --</p> <p>6 Q Yes, sir. This question that was a 7 question I asked of United Inn and Suites was, admit 8 that law enforcement from DeKalb County Police 9 Department notified United Inn and Suites of 10 prostitution at the hotel. And the hotel responded 11 to this and made some objections, and then said 12 admitted. In other words, the hotel admitted that 13 the DeKalb County Police Department did notify the 14 hotel of prostitution on the property. Is that -- is 15 that something you're aware of, or no?</p> <p>16 A Maybe when the thing occurred, then we 17 were aware of that, what's going on, yeah.</p> <p>18 Q Did you participate in any conversations 19 with the DeKalb County Police Department officers 20 about prostitution on the property?</p> <p>21 A Whenever we see like a unusual activity, 22 we just tell them so they can go and check what's 23 going on. That's the conversation we do. Yeah.</p> <p>24 Q Well, I hear your answer, but I want to 25 focus a little more specifically on commercial sex</p>
<p style="text-align: right;">Page 55</p> <p>1 A Maybe they have more experience than we, 2 because we're not trained, just the police officer. 3 So, maybe they have a better eye.</p> <p>4 Q Did you consider commercial sex activity, 5 that is sex for money, whether it's prostitution or 6 sex trafficking -- did you consider sex activity to 7 be common at the United Inn and Suites from 2017 to 8 2019?</p> <p>9 A No.</p> <p>10 Q Take a look at Plaintiff's Exhibit 4, 11 which we just looked at a second ago. And I want to 12 look at the response number 45, which is on page 15. 13 Mr. Shareef -- Mr. Islam, I'm going to read this to 14 you, Request 45. Admit that law enforcement 15 officials from the DeKalb County Police Department 16 notified you of prostitution on the property.</p> <p>17 Response: Defendant objects to this request as it's 18 not limited at scope of time. Subject to this 19 objection and without waiving the same, admitted.</p> <p>20 And what I can represent to you about that 21 answer, Mr. Islam, is that there were objections 22 made, but the answer provided at the end of the 23 objection says, admitted. In other words, admitting 24 that law enforcement officials from the DeKalb County 25 Police Department notified United Inn and Suites of</p>	<p style="text-align: right;">Page 57</p> <p>1 activity or prostitution or sex trafficking. Did you 2 ever specifically talk about those topics with DeKalb 3 County police?</p> <p>4 A If there is any kind of like prostitution 5 going on? Because we don't even know what's going on 6 so we just tell them, so maybe you can go and check 7 with your experience, so...</p> <p>8 Q Did you ever have a conversation with the 9 DeKalb County Police Department where they were using 10 the term "prostitution"?</p> <p>11 A What? I'm sorry.</p> <p>12 Q Where the DeKalb County Police Department 13 officers were using the term "prostitution" and 14 talking about prostitution on the property, did you 15 ever participate in conversations where that 16 occurred?</p> <p>17 A Any kind like a meeting for -- regarding 18 that?</p> <p>19 Q Meeting, phone call, in-person discussion.</p> <p>20 A The discussion, yes, with the -- with 21 those officers, yes.</p> <p>22 Q And the term "prostitution" was used?</p> <p>23 A Yes.</p> <p>24 Q What would they say about it?</p> <p>25 A Whenever - because we don't know about</p>

<p style="text-align: right;">Page 58</p> <p>1 that exact thing, about the prostitution and other 2 statements. And maybe like somebody's doing some -- 3 some kind of activity, so can you check.</p> <p>4 Q And what would prompt you to call?</p> <p>5 A Somebody wearing like inappropriate 6 clothes.</p> <p>7 Q Anything else?</p> <p>8 A Not really, no.</p> <p>9 Q I mean, I'm just trying to figure out what 10 kinds of things would you have been seeing that would 11 prompt you to call and say, hey, I think there might 12 be something going on here?</p> <p>13 A Sometimes if people in and out from any 14 room.</p> <p>15 Q Do you recall having more than one 16 conversation with the DeKalb Police Department about 17 prostitution?</p> <p>18 A Whenever we have problem, yes.</p> <p>19 Q Did you ever have any communications with 20 the DeKalb Police Department in writing?</p> <p>21 A No.</p> <p>22 Q Or oral?</p> <p>23 A Yeah, basically convey to the officers, so 24 they can convey their way.</p> <p>25 Q During the time that you've been at the</p>	<p style="text-align: right;">Page 60</p> <p>1 walking to Room 101 of the hotel. She didn't have a 2 key to the room and left the officers waiting in the 3 room while she went back to the front desk to get a 4 key for having -- before having commercial sex. And 5 when she went back to the room, the undercover 6 officers arrested her.</p> <p>7 Is this a report that you're familiar 8 with?</p> <p>9 A No.</p> <p>10 Q Do you agree that there was prostitution 11 at the United Inn and Suites as of August 2015?</p> <p>12 A If it said that report, then we already 13 find out what's going on.</p> <p>14 Q Well, my question was --</p> <p>15 A Yes.</p> <p>16 Q -- do you believe that there was 17 prostitution at the United Inn and Suites in 18 August -- -</p> <p>19 A Of that report --</p> <p>20 Q -- 2015?</p> <p>21 A -- yes.</p> <p>22 (Exhibit No. 9 was marked for 23 identification.)</p> <p>24 Q (By Mr Bouchard) Showing you what's been 25 marked as Plaintiff's Exhibit 9. And this is June</p>
<p style="text-align: right;">Page 59</p> <p>1 United Inn and Suites, Mr. Islam, how many instances 2 do you believe there's been prostitution at the 3 hotel?</p> <p>4 A I heard few of them, so -- and being 5 arrested when we find out what's going on.</p> <p>6 Q Give me an estimate of how many instances.</p> <p>7 A My knowledge, maybe five, six.</p> <p>8 Q In the time -- in the entire time you've 9 worked --</p> <p>10 A Yeah.</p> <p>11 Q -- at the hotel?</p> <p>12 A Yeah.</p> <p>13 Q All right. Let's look at Plaintiff's 14 Exhibit 8 from Mr. Shareef's deposition.</p> <p>15 (Exhibit No. 8 was marked for 16 identification.)</p> <p>17 Q (By Mr. Bouchard) Showing you what's been 18 marked as Plaintiff's Exhibit 8, which is a police 19 report dated August 12th, 2015, Mr. Islam. And you 20 can see in the top left-hand corner it says, Incident 21 type: Prostitution. And I'll represent to you that 22 the long narrative on the next page, I'll represent 23 to you that it says that a woman was arrested for 24 prostitution at the United Inn after meeting two 25 undercover police officers in the parking lot and</p>	<p style="text-align: right;">Page 61</p> <p>1 2nd, 2017, police report, Bates-stamped Plaintiff 2 1379 to Plaintiff 1383.</p> <p>3 Mr. Islam, this report, if you look at the 4 last page, refers to a man that was arrested after 5 beating a woman in Room 345 at the United Inn over 6 monies owed for sexual favors. Is this a report that 7 you're familiar with?</p> <p>8 A No.</p> <p>9 Q Do you agree there was prostitution on the 10 property in June 2017?</p> <p>11 A I don't know. If this is their opinion, 12 so I -- I cannot say anything, so...</p> <p>13 (Exhibit No. 10 was marked for 14 identification.)</p> <p>15 Q (By Mr. Bouchard) Take a look at 16 Plaintiff's Exhibit 10, which is Bates-stamped 17 Plaintiff 1398 to 13 -- to 1401. Police report dated 18 June 20th, 2017. And this is a report, sir, that 19 documents police responding to a fight between a 20 prostitute and her pimp in Room 101 of the United 21 Inn. The pimp left the prostitute's room after the 22 fight to go stay in another woman's room at the 23 hotel.</p> <p>24 Are you familiar with this report?</p> <p>25 A No.</p>